

**FILED**

AUG 21 2018

Mark C. McCartt, Clerk  
U.S. DISTRICT COURT

## UNITED STATES DISTRICT COURT

for the

Northern District of Oklahoma

United States of America

v.

TREVEON VAUGHN

Case No.

18-MJ-106-PJC

Defendant(s)

**CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of August 17, 2018 in the county of Tulsa in the  
Northern District of Oklahoma, the defendant(s) violated:*Code Section*


18 U.S.C. § 922(g)(1)

*Offense Description*

Unlawful Possession of a Firearm by Felon

This criminal complaint is based on these facts:

See Attached Affidavit by SA Jamie M. Cavitt, FBI

☒ Continued on the attached sheet.  
Complainant's signatureSpecial Agent Jamie M. Cavitt, FBI  
Printed name and title

Sworn to before me and signed in my presence.

Date:

Aug. 21, 2018

City and state:

Tulsa, OK

  
Judge's signatureMagistrate Judge Paul J. Cleary  
Printed name and title

**AFFIDAVIT**

I, Jamie M. Cavitt, a Special Agent with the Federal Bureau of Investigation (FBI), being duly sworn, depose and state as follows:

1. I am a Special Agent of the Federal Bureau of Investigation (FBI), United States Department of Justice, and as such, I am an investigative or law enforcement officer within the meaning of Title 18, United States Code, Section 2510(7), that is, an officer of the United States who is empowered by law to conduct investigations of, and to make arrests for, offenses enumerated in Title 18, of the United States Code. I am currently employed as a Special Agent with the FBI and have been so employed since August 2012. I am presently assigned to the Tulsa Resident Agency of the FBI, where I investigate and have investigated violations of federal criminal law. I was previously a commissioned Police Officer for over 8 years at the Wichita Police Department in Wichita, Kansas. During these assignments, I investigate violations of state and federal law to include, but not limited to, violent crimes (bank robbery, aggravated assaults, etc.), crimes on Indian land, public corruption, firearms violations, gang violence, conspiracy and narcotics trafficking. I have gained experience and knowledge through training and everyday work related to conducting these types of investigations.

2. As a result of my training and experience as a FBI Special Agent and a police officer, I am familiar with Federal criminal laws. I know the possession of a firearm or ammunition by a prohibited person is a violation of Title 18, United States Code, and Section 922(g)(1). 18 U.S.C. §§ 922(g)(1) states the following:

(g) It shall be unlawful for any person

(1) who has been convicted in any court of a crime punishable by imprisonment for a term exceeding one year; to possess in or affecting commerce, any firearm or ammunition.

3. The statements in this affidavit are based in part on information provided by the Tulsa Police Department's (TPD) investigation of a robbery with a dangerous weapon, which occurred at the Dollar General, 3932 East Admiral Place, Tulsa, Oklahoma, in the Northern District of Oklahoma, and on my experience and background as a FBI Special Agent. Since this affidavit is being submitted for the limited purpose of a criminal complaint, I have not included each and every fact known to me concerning this investigation. I have set forth only the facts which I believe are necessary to assist in the issuance of a Complaint and to establish probable cause to believe a violation of Title 18, United States Code, Sections 922(g)(1) was committed by TREVEON VAUGHN.

#### **PROBABLE CAUSE**

4. On August 17, 2018, at approximately 8:09 a.m. the Dollar General at 3932 East Admiral Place, Tulsa, Oklahoma within the Northern District of Oklahoma, was the victim of a robbery. Victim Employee "A" told law enforcement, a black male later identified by law enforcement as Treveon Vaughn, entered the Dollar General wearing a ski mask and a black hoodie. Vaughn possessed and pointed a pistol with an extended magazine at Victim Employee "A" demanding the money from the store. Victim Employee "A" entered the time delayed safe code while Vaughn waited for the safe to open.

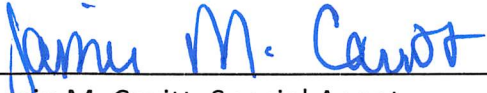
5. Vaughn waited for the time delayed safe inside the Dollar General and saw law enforcement in the front parking lot. Vaughn exited the Dollar General through the rear/back exit and was confronted by law enforcement, which Vaughn then retreated inside the store. The employees and customers exited the store through the front door, which left Vaughn inside the store alone. Vaughn refused to exit the store and law enforcement contained Vaughn inside the store. After several hours, Vaughn exited the store and was taken into custody by law enforcement.

6. Law enforcement searched the Dollar General and recovered a black Ruger, Model LCP, .380 caliber firearm, serial number 37024683. The firearm was chamber loaded with an extended magazine loaded with twelve rounds of .380 ammunition for a total of thirteen rounds. The firearm and ammunition are being stored at the TPD Evidence and waiting further analysis by BATFE. Your affiant knows from her training and experience, Ruger firearms are not manufactured in the state of Oklahoma and must have traveled in interstate commerce to arrive within the state of Oklahoma. The firearm was reported stolen from TPD case number 2014-073052.

7. Vaughn told law enforcement, after waiving his *Miranda* rights, he was armed with a .380 caliber handgun with an extended magazine which Vaughn bought the gun off of the streets a couple weeks prior to the robbery. Vaughn also told law enforcement he hid the handgun inside the Dollar General store.

8. Your affiant researched the criminal history of Vaughn and determined he had two felony convictions to include two counts of Shooting with Intent to Kill resulting in nine years prison sentence.

9. Based on the information set forth above, I believe there is probable cause Vaughn possessed a firearm or ammunition by a prohibited person described herein, and request the Court issue a Complaint and Arrest Warrant for TREVEON VAUGHN.

  
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Jamie M. Cavitt, Special Agent  
Federal Bureau of Investigation

Sworn and substance to before me this 21<sup>st</sup> day of August 2018.

  
\_\_\_\_\_  
PAUL J. CLEARY  
United States Magistrate Judge